

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,  
*Plaintiff,*

v.

**Case No. 3:21-cr-00897**

UMAR ADEYOLA,  
*Defendant.*

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**DEFENDANT’S EMERGENCY BOND MOTION FOR AMEND DETENTION  
ORDER TO PERMIT DEFENDANT TO ATTEND THE FUNERAL OF  
GRANDMOTHER IN BUFFALO**

COMES NOW the Defendant, Umar Adeyola, pro se, to request an emergency release from Home Confinement from May 23, 2022 to May 27, 2022, so that he may attend his grandmother’s funeral in Buffalo, New York on Wednesday, May 25, 2022.

1. Petitioner received a Compassionate Release on July 15, 2020, from the Bureau of Prison’s (BOP) Cumberland Prison Camp in order to receive consistent treatment for his medical condition (Multiple Sclerosis).
2. Petitioner has been subject to home confinement since his compassionate release and currently receiving treatment which has slowed the progression of his disorder.
3. Petitioner has been under Home Confinement supervision for one year and eleven months without incident. Petitioner is in complete compliance with the terms and conditions of his release.

4. In April 2022, Petitioner's home confinement conditions were reduced from an permanent ankle bracelet to BI Smart Link that provides monitoring allowing officers to confirm location, curfew and travel restriction compliance at any time.
5. Petitioner is the eldest of seven siblings. He is close with his family and was the primary care giver for his grandmother Viola Brunson, who was suffering significant health failures related to old age. Viola Brunson died on May 16, 2022, at the age of 101 years old, **(see attached)**.
6. In light of Petitioners medical problems, being allowed to attend his grandmother's funeral and have contact with his family is particularly important to defendant's well-being. His record while on home confinement release both before and after he pled guilty in this case establishes that he poses no flight risk or danger if the motion were granted.
7. The funeral for the grandmother will be held on May 26, 2022 at 11:00 am in Buffalo, New York at the Lombardo Funeral Home or Miracle Mission Baptist Church with the internment to follow at the Forest Lawn Cemetery.
8. Petitioner is requesting release from May 23, 2022 to May 27, 2022, so that he can attend the funeral of his grandmother in Buffalo, New York and return to New Jersey. Petitioner requests release on Tuesday, May 23, 2022, by noon with a return day of Friday, May 27, 2022. The petitioner requests the additional days before and after the funeral to allow time to assist in the preparations for the funeral beforehand, and to allow time to grieve with family and prepare to make the drive back after.

9. If this request is granted, Petitioner will be picked up by his sister from his current residence, and she will drive to Buffalo. He will stay at his parents' home at 214 Tonawanda Creek Buffalo, New York during his time of temporary release and will be driven back to his residence on Friday, May 27, 2022.
10. Temporary release is authorized pursuant to 18 U.S.C. 3622 (a)(2). Based upon the petitioner's previous history under supervision in this case, there is reasonable cause to believe that the petitioner will honor the trust that this Court imposes upon him should his request be granted.
11. Petitioner has discussed this request with Probation Officer Specialist Andrew Senatore and he does not oppose the granting of travel request.
12. Petitioner understands that the seriousness of the consequences that would result should there be any issues during release.
13. Petitioner has no objections to ruling on papers to expedite this request.

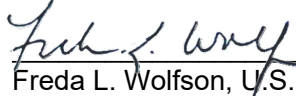
WHEREFORE, for the reasons stated herein, and for other good cause, counsel requests an order permitting Mr. Adeyola to leave custody from May 23, 2022 until May 27, 2022 to attend his grandmother's funeral in Buffalo, NY.

Respectfully submitted,

s/ Umar Adeyola

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DATED: May 19, 2022

So Ordered:

  
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Freda L. Wolfson, U.S.C.D.J.  
May 20, 2022

Attachment: Out-of-State Transfer of Deceased